

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**
(Northern Division)

**BALTIMORE COUNTY BRANCH
OF THE NATIONAL ASSOCIATION
FOR THE ADVANCEMENT OF
COLORED PEOPLE, *et al.***

Plaintiffs,

-vs.-

**BALTIMORE COUNTY,
MARYLAND, *et al.***

Defendants.

Civil Action No. 21-cv-03232-LKG

**JOINT MOTION
FOR EXTENSION OF TIME TO ANSWER OR RESPOND TO COMPLAINT**

Plaintiffs Baltimore County Branch of the National Association for the Advancement of Colored People, League of Women Voters of Baltimore County, Common Cause Maryland, Charles Sydnor, Anthony Fugett, Dana Vickers Shelley, Danita Tolson, Sharon Blake, Gerald Morrison, and Niesha McCoy (collectively, “Plaintiffs”) and Defendant Baltimore County Board of Elections (“BOE”) hereby jointly submit this Motion seeking an extension of time by which BOE must answer or otherwise respond to the Complaint. In support thereof, the Parties state the following:

1. On February 1, 2022, this Court entered an Order granting the Parties’ request to extend the time by which BOE was to answer or otherwise respond to the Complaint. Consistent with the Parties’ request, the Order instructed BOE to answer or otherwise respond to the Complaint within “30 days from the date on which the Court issues a ruling on Plaintiffs’ pending motion for preliminary injunction.”

2. On February 22, 2022, the Court issued a Memorandum Opinion and Order granting Plaintiffs' Motion for Preliminary Injunction, making BOE's responsive pleading due on **March 24, 2022**.

3. In the interim, the Court has ordered that the Parties present additional briefing, testimony and argument on issues related to the Court's February 22, 2022 Order.

4. Accordingly, the Parties request that the date by which BOE must answer or otherwise respond to the Complaint be extended an additional 30 days: from March 24, 2022 to **April 25, 2022**.

5. In submitting this Motion, BOE expressly reserves all rights and defenses it may have to this action, including the right to file a motion to dismiss on any and all claims raised in the Complaint.

Dated: March 18, 2022

For Plaintiffs

/s/ Andrew D. Freeman (w/ Authority)

Andrew D. Freeman (Bar #03867)
BROWN, GOLDSTEIN & LEVY LLP
120 E. Baltimore Street, Suite 2500
Baltimore, MD 21202
(410) 962-1030
adf@browngold.com

Deborah A. Jeon (Bar #06905)
Tierney Peprah (Bar #21986)
**AMERICAN CIVIL LIBERTIES UNION
OF MARYLAND**
3600 Clipper Mill Road, Suite 350
Baltimore, MD 21211
(410) 889-8555
jeon@aclu-md.org

John A. Freedman (Bar #20276)
Mark D. Colley (Bar #16281)

Respectfully and jointly submitted,

*For Defendant Baltimore County Board of
Elections*

/s/ Harry S. Johnson

Harry S. Johnson
Fed Bar No.: 00618
hjohnson@wtplaw.com
Warren N. Weaver
Fed Bar No.: 03600
wweaver@wtplaw.com

Aaron A. Nichols
Fed Bar No.: 19563
anichols@wtplaw.com
WHITEFORD, TAYLOR & PRESTON LLP
Seven Saint Paul Street, Suite 1500
Baltimore, Maryland 21202
Tel: 410-347-8743

ARNOLD & PORTER KAYE SCHOLER LLP

601 Massachusetts Ave, N.W.

Washington, D.C. 20001

(202) 942-5000

john.freedman@arnoldporter.com

Michael Mazzullo (*pro hac vice* pending)

ARNOLD & PORTER KAYE SCHOLER LLP

250 W. 55th Street

New York, NY 10019

(212) 836-8000

michael.mazzullo@arnoldporter.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this **18th** day of **March, 2022**, I caused a true and correct copy of the foregoing Joint Motion to be served upon all counsel of record via the Court's CM/ECF system.

Dated: March 18, 2022

/s/ Aaron A. Nichols

Aaron A. Nichols, Esq.

Federal Bar No.: 19563

Anichols@wtplaw.com

12245379